



United States of America,

Plaintiff,

v.

Toniquewa Ballard,

Defendant.

Case No. 2:15-cr-00195-GMN-DJA

**Order to Modify Conditions of Pretrial
Release**

9 Based on the pending stipulation of counsel, and good cause appearing therefore, IT IS
10 HEREBY ORDERED that Ms. Ballard's bond is modified as follows:

11 1. The defendant is to attend and complete an inpatient treatment program at the
12 discretion of Pretrial Services and complete any after-care program, which may include
13 placement in a transitional living facility-halfway house

14 2. Pretrial Services will coordinate with the U.S. Marshals the defendant's release
15 date and time. Pretrial Services will provide transportation to the approved inpatient facility.

16 All language referring to New Frontier in Ms. Ballard's bond is deleted and replaced
17 with "inpatient treatment."

18
19 Dated October 1, 2019

Daniel J. Albregts
United States Magistrate Judge

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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
9

10 United States of America,
11 Plaintiff,
12 v.
13 Toniquewa Ballard,
14 Defendant.

Case No. 2:15-cr-00195-GMN-DJA
**Stipulation to Modify Conditions of
Pretrial Release**

15 On September 26, 2019, Judge Albregts ordered Ms. Ballard released to inpatient
16 treatment at New Frontier, a facility located in Fallon, Nevada. The parties and Pretrial
17 Services have since learned that Ms. Ballard is unable to travel by airplane to Fallon.¹ Pretrial
18 Services believes that travel via airplane is the safest and most secure method of
19 transportation to northern Nevada, as bus travel would require multiple stops and take
20 upwards of 18 hours. Pretrial Services has indicated that another option is the WestCare
21 women's facility located here in Las Vegas, which will have a bed available tomorrow.²
22 Upon consultation with Pretrial Services, the parties therefore request that this Court modify
23 Ballard's bond as follows:
24

25 ¹ Ms. Ballard believes that if she flies, due to the high elevation, her ears will burst and
26 she will die.

² Pretrial Services asked that the modified conditions not name a specific facility
because that limits the office in placement options.

1 1. The defendant is to attend and complete an inpatient treatment program at the
2 discretion of Pretrial Services and complete any after-care program, which may include
3 placement in a transitional living facility-halfway house

4 2. Pretrial Services will coordinate with the U.S. Marshals the defendant's release
5 date and time. Pretrial Services will provide transportation to the approved inpatient facility.

6 The parties also jointly request that the Court remove all language referring to New
7 Frontier from Ms. Ballard's bond and replace it with reference to "inpatient treatment."

8 The parties and Pretrial Services agree to the above modifications.

9 DATED: October 1, 2019

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11 Rene L. Valladares
12 Federal Public Defender

Nicholas A. Trutanich
United States Attorney

13 By /s/ Erin Gettel
14 Erin Gettel
15 Assistant Federal Public Defender

By /s/ Robert Knief
Robert Knief
Assistant United States Attorney